

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ANALYTICAL TECHNOLOGIES, LLC,

*Plaintiff,*

v.

AMERICAN DAIRY QUEEN  
CORPORATION,

*Defendant.*

Case No. 2:24-cv-00445-JRG-RSP

(LEAD CASE)

ANALYTICAL TECHNOLOGIES, LLC,

*Plaintiff,*

v.

STARBUCKS CORPORATION,

*Defendant.*

Case No. 2:24-cv-00448-JRG-RSP

(MEMBER CASE)

**UNOPPOSED MOTION TO WITHDRAW DEFENDANT STARBUCKS  
CORPORATION'S MOTION FOR A PROTECTIVE ORDER  
QUASHING PLAINTIFF'S DEPOSITION NOTICE OF  
STARBUCKS' LEAD COUNSEL RACHAEL LAMKIN (DKT. NO. 96)**

Defendant Starbucks Corporation (“Starbucks”) files this Unopposed Motion to Withdraw Defendant Starbucks Corporation’s Motion for a Protective Order Quashing Plaintiff’s Deposition Notice of Starbucks’ Lead Counsel Rachael Lamkin (Dkt. No. 96).

On February 17, 2025, Starbucks filed its Motion for a Protective Order Quashing Plaintiff’s Deposition Notice of Starbucks’ Lead Counsel Rachael Lamkin (“Motion to Quash”) (Dkt. No. 96). Following the filing of Starbucks’ Motion to Quash, counsel for Starbucks and

counsel for Plaintiff Analytical Technologies, LLC (“AT”) continued to diligently meet and confer on the outstanding discovery issue related to AT’s subpoena to take the deposition of Starbucks’ lead counsel, Rachael Lamkin (“Ms. Lamkin”). On February 26, 2025, AT withdrew its subpoena to take the deposition of Ms. Lamkin. As a result of AT’s withdrawal of its subpoena to take the deposition of Ms. Lamkin, the Motion to Quash is moot. Therefore, Starbucks requests that the Motion to Quash be withdrawn.

Counsel for Starbucks met and conferred with counsel for AT to discuss the substantive relief sought in this Motion, and counsel for AT indicated that AT is unopposed to the relief sought in this Motion.

WHEREFORE, Starbucks respectfully requests that the Court grant this Unopposed Motion and enter an order withdrawing Starbucks’ Motion to Quash.

Dated: February 28, 2025

Respectfully submitted,

*/s/ Melissa R. Smith*

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*Counsel for Defendant  
Starbucks Corporation*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Starbucks met and conferred with counsel for AT to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h-i). Counsel for AT indicated that AT is unopposed to the relief sought herein.

*/s/ Melissa R. Smith*

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Melissa R. Smith

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served with a true and correct copy of the above and foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 28, 2025.

*/s/ Melissa R. Smith*

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Melissa R. Smith